
Rakym Durham,	:	United States District Court
Prosecution,	:	Pennsylvania Eastern District
v.	:	
City of Philadelphia, et al.,	:	Civil Division
Defendant.	:	2:20-cv-03944

NOTICE FOR HEARING

AND NOW, this ____ day of _____, 2020, upon application of D.

Wesley Cornish, Esquire, a hearing is hereby ordered for the within Motion for the ____ day of _____, 2020, in Courtroom _____, at _____am/pm.

BY THE COURT:

Judge Defino-Nastasi

Rakym Durham,	:	United States District Court
Prosecution,	:	Pennsylvania Eastern District
v.	:	
City of Philadelphia, et al.,	:	Civil Division
Defendant.	:	2:20-cv-03944

ORDER

AND NOW, this _____ day of _____, 2020, it is hereby **ORDERED** and **DECREED** that Plaintiff's Motion is **GRANTED**.

BY THE COURT:

Judge

Rakym Durham,	:	United States District Court
Prosecution,	:	Pennsylvania Eastern District
v.	:	
City of Philadelphia, et al.,	:	Civil Division
Defendant.	:	2:20-cv-03944

MOTION TO EXTEND TIME TO FILE AN AMENDED COMPLAINT

AND NOW, comes the Plaintiff, Rakym Durham, via his attorney, David Wesley Cornish, Esquire, who respectfully represents the following:

1. On or about November 25, 2020 this Court dismissed part of the Plaintiff's claim without prejudice and ordered him to file an amended complaint within 2 weeks, while acknowledging there were issues with serving a John Doe Defendant Police Officer.
2. Plaintiff's counsel has spoken with Defense Counsel who represented she would start the process to retrieve the paperwork in the City's computer system and distribute it to Counsel so an amended pleading can be filed.
3. Plaintiff asks this Court to allow him a 21-day extension to January 5, 2021 to obtain these materials and file an amended complaint.

WHEREFORE, for the foregoing reasons, Defense Counsel, respectfully requests that this Honorable Court allow him to withdraw from representing the Defendant.

Respectfully Submitted,

D. Wesley Cornish, Esquire
Cornerstone Legal Group, LLC
230 South Broad Street, 17th Floor
Philadelphia, PA 19102
Phone: 888-313-1385
Supreme Court # 310865
Date: December 9, 2020

Rakym Durham,	:	United States District Court
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City of Philadelphia, et al.,	:	Civil Division
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VERIFICATION

The facts set forth in the foregoing are true and correct to the best of the undersigned's knowledge, information and belief and are verified subject to the penalties for unsworn falsification to authorities via 18 Pa.C.S.A. § 4904 and the United States laws for perjury.

CERTIFICATE OF SERVICE

I hereby certify I on this day, am serving the foregoing upon the persons indicated below via electronic delivery, which satisfies the requirements of the Rules of Criminal/Civil Procedure to:

1. **Shannon Zabekl, Esquire**
City Law Department
1515 Arch Street, 14th Floor
Philadelphia, PA 19107

E-File

Respectfully Submitted,

D. Wesley Cornish, Esquire
Cornerstone Legal Group, LLC
230 South Broad Street, 17th Floor
Philadelphia, PA 19102
Supreme Court # 310865
Date: December 9, 2020